

**NEWPORT CITY COUNCIL
LOCAL DEVELOPMENT PLAN EXAMINATION**

HEARING SESSION 13: ALTERNATIVE HOUSING SITES

Prepared by Boyer Planning on behalf of Mrs H.E. Murray (1666)

Background to this Statement

1. This statement is prepared on behalf of our client Mrs Murray who owns approximately 8 ha of land at the Griffin, Bassaleg. The site (a plan of which is included at appendix 1) is located immediately adjoining the built up edge of Bassaleg and is capable of accommodating approximately 90 dwellings as well as approximately 1 ha of education/leisure provision.
2. The site is immediately available for development and complies with the relevant technical objectives of PPW including para 4.4 in meeting the needs of residents and para 9.2.3 of PPW insofar as it is free from constraints and economically feasible for development. It would contribute towards the overarching strategy of the plan in providing housing to meet the needs of Newport and help align housing supply to job creation and growth.
3. In this regard, we would expect that subject to detailed planning permission it would contribute towards the housing land supply and be developed over a period of 2 to 5 years.
4. In response to the Deposit LDP, we submitted representations proposing the inclusion of land at The Griffin, Bassaleg within the list of allocated housing sites (1666.L2/H01) as well as the inclusion of the site within the Settlement Boundary (1666.L3/SP05) and removal from the Special Landscape Area (1666.L1/SP08). This representation, concerning the alternative site, is to be read in conjunction with representations in relation to the Deposit LDP's housing provision strategy (1666.L4/H01) and the Hearing Statements submitted to Examination Sessions 2 and 3 (ED004.8/ED005.7).
5. For the reasons set out herein, the subject site should be expressly identified for housing, additional information in this regard is provided in the following appendices which is to be read in conjunction with this Statement:

- Appendix 1: Site Location Plan
- Appendix 2: Development Framework Document
- Appendix 3: Illustrative land use masterplan
- Appendix 4: Ecological Assessment
- Appendix 5: Access Drawings
- Appendix 6: Letter from Llanmoor Homes

Question 1: On what basis is the allocation contended to be needed in order to make the Plan sound?

6. Based on the evidence presented at Hearing Sessions 2 and 3, it is presently the case that the plan would fail a number of the relevant tests of soundness (including C2, CE1, CE2 and CE4). Following the initial hearing statements it is the case that:
 - i. The distribution of proposed housing allocations does not reflect a robust nor appropriate range and choice of housing for existing communities contrary to the requirements of PPW para 9.1.1;

ii. The LDP strategy and approach to housing supply is based on a continuation of the UDP approach and is fundamentally reliant upon sites that have largely remained unimplemented and that do not comply with the PPW para 9.2.3 requirement to be free, or readily freed, from planning, physical and ownership constraints, and economically feasible for development, so as to create and support sustainable communities where people want to live;

iii. The residual requirement of the LDP is already increasing and it is plainly the case that the reliance upon windfall sites (to make up for the shortfall in new allocations and lack of delivery of strategic sites) seems set to continue with the identified supply already reliant upon sites such as the former Panasonic site which represents a significant element of double counting;

iv. If the annual housing target (which is now at least 734 dwellings) is to be met then it will require the supply to be comprised of a mixture of deliverable sites in a range of locations across the Local Authority area. Historically the Council confirmed that on when completions achieved around 700 per annum it has been based on deliverable sites in a wide range of sites (including Afon Village at Rogerstone, Celtic Horizon at West Newport, as well as sites within the urban area of Newport and at Langstone and Caerleon). Such a mix is required if the LDP requirement is to be achieved;

v. There is agreement that there is a shortfall in housing numbers identified within the supply to meet the requirement. Whilst the exact shortfall is to be determined when more accurate information is prepared by the Council, it is likely to be in excess of 1,000 dwellings due to:

- reliance upon s106 sites (250) that have remained unsigned for several years. These sites are windfall sites, that do not have planning permission and cannot be considered to be available in line with PPW. Accordingly such cannot be relied upon as part of the supply pool;
- sites remain that are still subject to constraints and unlikely to be available for development. There are numerous sites that have been within JHLAS schedules for over 15 years and absent any evidence of progress they will be removed from the 2014 JHLAS. In addition based on evidence submitted to the examination and proposed location of H16 (i and ii) allocations other sites will be moved into 3(i) of the JHLAS. Such sites could account for up to 700 dwellings;
- in addition we note the East Bank is a railway siding and is being used for storage by Network Rail and there are around 100 dwellings at City Vizion that have been double counted. These would account for a further 200 shortfall; and
- reliance upon windfall sites and double counting of windfalls. The UDP relied upon windfall sites being identified due to the failure of allocated sites to be brought forward for development and deliver at the rates required. The LDP relies upon precisely the same sites and due to the failure to date of large sites to be delivered is already reliant upon windfall sites (such as Panasonic).

vi. There are substantial concerns over the ability of the four sites that comprise the Eastern Expansion Area to deliver c.3600 dwellings during the plan period (300 per annum between April 1st 2014 and march 31st 2026) based on historic lack of delivery,

location of gypsy allocations, lack of present interest from volume housebuilders and historic completions rates on sites elsewhere in Newport (Afon Village at Rogerstone averaged 95 dwellings per annum). This could result in a significant material shortfall in dwellings over the plan period.

7. Accordingly further additional deliverable land is required to be identified in order to achieve the overall housing requirement, strategy of the plan and aims of the Welsh Government and Welsh Minister. Such further sites are required in order to satisfy the following tests of soundness:

- C2 to ensure that the Plan is sufficiently robust and flexible to ensure compliance with Planning Policy Wales and allocate sufficient and appropriate land for housing;
- CE1 to ensure that Policies flow logically from the strategy of the plan which seeks to identify suitable land for housing to match job growth with strategy and meet the needs of the community;
- CE2 to ensure that it is based on credible and reliable evidence; and
- CE4 to ensure appropriate flexibility to deal with the continued shortfall of housing land, the failure of existing sites to be developed and reliance upon unidentified supply.

Question 2: Is the site free from constraints and deliverable?

8. As part of the ongoing promotion through the LDP process detailed assessments relating to the site have been undertaken to confirm the deliverability of the site. The assessments informed the production of the Development Framework Document, submitted as part of the of the Deposit LDP stage which has been updated for submission as part of this Hearing Statement (as attached at Appendix 2).

9. An illustrative masterplan (Appendix 3) has been prepared and submitted as part of the Development Framework Document to illustrate the way in which development could proceed.

10. The masterplan highlights the site's ability to provide a combination of leisure/educational development along with the enabling residential development. The masterplan provides 3 ha of developable land for residential use which is capable of providing approximately 80-90 homes at a density of 30dph and approximately 1.10ha of leisure/educational land.

11. The layout has taken account of the site's characteristics and surroundings by locating the proposed leisure/educational land adjoining the existing Bassaleg Secondary School to allow the potential of shared use, whilst the residential development has been located within the field parcels, with the majority of the surrounding and internal vegetation retained. Furthermore, the residential development has been located away from the adjoining Court Wood to minimise any impact, whilst also avoiding development on the higher level land.

12. Llanmoor Homes have considered the site and confirm that from their perspective it is deliverable and development could proceed as we have suggested.

13. It is considered that there are no obstacles to the delivery of the site. On approval of a planning application it would be available to contribute towards the TAN 1 five year supply of genuinely available land for housing. We summarise the main technical considerations below:

Sustainability

14. The site is in close proximity to a number of Bus stops located along the A468 Caerphilly Road with regular bus services providing links to both local areas as well as an inter urban bus service providing access to Newport, Caerphilly, Ystrad Mynach, Cardiff and Bargoed. Furthermore, work is currently progressing for a new rail station at Pye Corner to extend services on the Cardiff – Ebbw Vale line.

15. The site is within a reasonable walking and cycling distance to Pentrepoeth Primary School (circa 1km) and is located adjacent to Bassaleg Secondary School.

16. Bassaleg has a community centre, a newsagent, post office, dentist, Nisa local store, pharmacy, hairdresser, fish and chip shop and several public houses and restaurants. There are also recreation and employment opportunities (circa 1km) to the north and east of the site.

17. It is also noted that there currently exists a 6.69 ha deficit within the Graig Ward for play space. It is considered by locating the proposed leisure/educational land adjoining the existing Bassaleg Secondary School will allow the potential of shared use in a sustainable location, as required by Proposed LDP Policy SP12 – Community Facilities. Of course this is predicated on the residential development, which would be required to provide the leisure/educational land.

Ecology

18. Ecology is not considered to be a constraint to the development of the site. This was confirmed by a Desk study and Extended Phase 1 Habitat survey (Appendix 4) which were undertaken Soltys Brewster Ecology.

19. The assessment confirmed that the site was not covered by any form of nature conservation designation and that no records of protected or notable flora and fauna were known within the site boundary. Also, that the site consisted mainly of improved grassland enclosed by a network of native hedgerows of varying quality, with Court Wood (SINC – GR11) adjacent to the eastern boundary.

20. The limited nature of the habitats within the site boundary is reflected in a similarly low potential to support protected fauna and the improved grassland is of little or no ecological interest. In regard to the adjoining woodland any future development would provide retention / protection of off-site broad-leaf woodland and consideration also given to minimising the impacts on hedgerows as far as practicable.

Flooding

21. TAN 15 Development Advice Maps indicates that the entire site is located within Zone A – Considered to be at little or no risk of fluvial or coastal flooding and would not constitute a constraint.

Drainage

22. Surface water run-off from the proposed development can be controlled and discharged at rates not exceeding the existing and currently undeveloped site, whilst foul water and sewage would be discharged to the local mains network.

23. Dwr Cymru Welsh Water has confirmed that there is adequate capacity in the local water network, local sewer network and waste water treatment to facilitate the development of the site.

Utilities

24. The site is well located to the existing mains networks within Bassaleg (water, power, gas and telecommunications). The proposed development is conveniently located to existing utilities and services from which new supplies can be taken.

Transport

25. Stuart Michael Associates have confirmed that primary vehicular access to the site would be formed directly onto The Griffin as illustrated at Drawing No 4836.003 (Appendix 5). The Griffin is subject to a 20mph zone adjacent to Bassaleg School. As part of the access proposals there is scope to provide additional footways and enhanced traffic calming along The Griffin

26. The Griffin connects with the strategic highway network (A468 Caerphilly Road) to the north of the site. This junction is currently a priority junction. Subject to a detailed traffic assessment this junction could be signalised. This could enhance drivers' ability to egress onto Caerphilly Road during peak times and also provide an additional safe crossing place for pedestrians. Signalisation of this junction, together with an extension of the traffic calming along the Griffin could deter non-access through traffic from using this corridor.

27. The proposals for access and the standard of the local highway network are capable of accommodating the potential traffic generation from the site.

Landscape

28. The site adjoins the settlement boundary of Bassaleg at the secondary school. It is therefore evident that the site is subject to urban and human influences and is well contained by topography and the Court Wood which forms a clear defensible boundary to the east and south.

29. The site is identified as being included within the designated Tredegar Park Special Landscape Area. In representations to the LDP regarding the site and the SLA it was noted that while undoubtedly some areas include landscapes worthy of protection, it is unclear whether all landscapes within the proposed designated areas are worthy of equal protection. This is particularly relevant in this case as the designation relates to Tredegar Park and the site has no relationship with this wider area.

30. Given the urban influences and physical containment of the site by the adjoining Court Wood it is considered that the site can be developed with no adverse impact upon the wider SLA.

Heritage

31. The Scheduled Monument (Hill Fort) at Coed Y Defaid is in excess of 500m from the southern boundary of the site and is visually separated by Court Wood.

Conclusion

32. It is evident from the assessments undertaken as part of the Development Framework Document (as detailed above) and the separate submissions made to the Deposit LDP in regards to Policy SP5 – Countryside, H1 – Housing Site (Allocation) and SP8 – Special Landscape Areas, that there are no overriding constraints to the development of the site.

33. Given the fact that the site is contiguous with and relates physically to the settlement boundary and is well contained it is evident that it is capable of providing a logical extension to Bassaleg.

34. The allocation at land at The Griffin will assist in providing certainty over delivery.

Question 3: Would allocation of the site fit with the plan strategy? What principal factors lead to this view?

35. As has been demonstrated, the dLDP presently fails to address the need for sufficient housing land to be identified in line with PPW and the strategy of the Plan itself. In allocating a

site that is genuinely available for development there will be certainly that needs can be met rather than relying upon sites that are unidentified and have previously remained unimplemented.

36. The allocation of the site is therefore required in order to address the following objectives of the plan:

- *Objective 1 – Sustainable use of land:* the site is located in a sustainable location in terms of existing facilities and will positively contribute towards the community. Furthermore there currently exists a shortfall of 6.69ha of play space within the Graig Ward. The site therefore both provides the required housing which consequently allows a contribution of 1 ha for providing leisure/educational space with seeks to contribute towards addressing the play space deficit;
- *Objective 2 – Climate change:* the site will contribute positively in terms of mitigating against the impacts of climate change by providing for the needs of its population, mitigating against out commuting and longer distance commuting across the city and incorporating design measures as appropriate at the detailed design stage;
- *Objective 3 – Economic Growth:* the site will complement the existing land supply and help match the level of future job growth with land for housing. It will help mitigate against the problems of a constrained housing land supply and:
 - i. Contribute towards the level of growth envisaged for Newport County;
 - ii. Provide adequate housing for the workforce to grow appropriately;
 - iii. Provide housing to help attract and retain a working age population and ensure no adverse impact on labour supply;
 - iv. Facilitate the formation of new households by matching supply to demand;
 - v. Help provide affordable housing across all parts of the city not just on the east;
 - vi. Help reduce reliance upon commuting out of the county
- *Objective 4 - Housing provision:* the site will ensure that there is an adequate supply of land in a sustainable location and ensure that the quantity, quality and variety of housing meets the needs of the population. It will ensure a PPW compliant supply of land for housing;
- *Objective 5 – Conservation of the built environment:* insofar as there will be no adverse impacts upon the quality of the historic or built environment;
- *Objective 6 – Conservation of the Natural environment:* as demonstrated by technical evidence submitted there will be no adverse impacts on landscape or biodiversity;
- *Objective 7 – Community Facilities:* as there will be an opportunity to provide community benefits to the local area including potential leisure/educational space;
- *Objective 8 - Culture and Accessibility:* the site will ensure access for all is achieved;
- *Objective 9 - Health and Well Being:* it will provide an environment that is safe and by encouraging walking will help promote suitable lifestyle choices;
- *Objective 10 – Waste:* it will incorporate measures to minimise the impact of waste.

37. Given the above, we consider that the site will contribute positively towards the existing strategy of the Plan and achieving the vision for Newport. It will complement the existing approach being taken by ensuring an additional source of deliverable and sustainable land for

housing. In this regard it will plainly ensure that the supply of housing is robust and sound in order to match the economic growth strategy being taken.

38. The changes to the Plan sought in relation to the site are a direct response to the inherent problems with the present land supply identified and will contribute towards the tests of soundness as set out in this statement.

Required Changes

39. The allocation of the land at the Griffin, Basseleg in Policy H1 for 90 dwellings and approximately 1.10ha of leisure/educational land which seeks to address the existing deficit in the Graig Ward and within a sustainable location as required by Policy SP12.

40. The alteration to the settlement boundary and removal from the SLA are consequential changes to the plan that would logically follow its allocation for development.

Boyer Planning
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